

AB:EJD

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

RAZA SIKANDAR,

Defendant.

AFFIDAVIT AND COMPLAINT IN  
SUPPORT OF AN APPLICATION FOR  
AN ARREST WARRANT

(18 U.S.C. § 1544)

20-M-1154

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EASTERN DISTRICT OF NEW YORK, SS:

LEAH NEWTON, being duly sworn, deposes and states that she is a Special Agent with the United States Diplomatic Security Service, duly appointed according to law and acting as such.

On or about November 18, 2020, within the Eastern District of New York, the defendant RAZA SIKANDAR did knowingly and willfully use a passport issued or designed for the use of another, to wit: John Doe.<sup>1</sup>

(Title 18, United States Code, Section 1544)

The source of your deponent's information and the grounds for her belief are as follows:<sup>2</sup>

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<sup>1</sup> The identity of John Doe is known to me.

<sup>2</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Diplomatic Security Service and have been since 2020. I have been involved in the investigations of numerous cases involving passport fraud. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. I have determined through my investigation that the defendant RAZA SIKANDAR is a citizen of the United States who exited the United States on February 5, 2016 and entered Germany on that same date. I have further determined through my investigation that RAZA SIKANDAR arrived in the Czech Republic on March 11, 2016. I have determined through my investigation that SIKANDAR obtained an attorney's license under an alias while living in the Czech Republic. On or about March or April of 2020, John Doe retained SIKANDAR'S services to assist Doe in his efforts to gain residency in the Czech Republic. Doe provided SIKANDAR with his United States passport, which bears a unique passport number<sup>3</sup> and an expiration date in 2029 ("the Doe passport"). SIKANDAR did not return the Doe passport to Doe.

3. On or about November 18, 2020, the defendant RAZA SIKANDAR travelled from Poland to the United States through John F. Kennedy International Airport in Queens, New York. SIKANDAR presented the Doe passport at the United States border as his official passport. An automated passport control kiosk took a photograph of the defendant at the time he presented the Doe passport for entry into the United States. The defendant's photograph triggered a facial recognition mismatch. The defendant was then

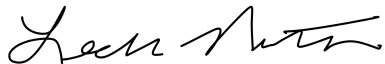
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<sup>3</sup> The Doe passport number is known to me.


instructed to report to a passport control secondary checkpoint. The defendant was interviewed at this passport control secondary checkpoint and stated that he was John Doe and had departed the United States in March of 2020. The defendant was questioned about biographic information from Doe's passport application. SIKANDAR was unable to verify any of Doe's biographic or personal information. SIKANDAR was then questioned about Doe's travel history and was unable to verify any information about Doe's travel history.

4. An agent from Customs and Border Patrol took the defendant into custody at JFK International Airport and fingerprinted the defendant. Upon comparison, these fingerprints identified the defendant as RAZA SIKANDAR, FBI Number 473410KB7, who has an open warrant in Prince William County, Virginia for a violation of probation. I have further compared the photographs taken of the defendant by Customs and Border Patrol at JFK International Airport on November 18, 2020 to a known photograph of RAZA SIKANDAR from the Wicomico County Sheriff's Department from an arrest dated November 6, 2015 and the photographs depict the same individual.

WHEREFORE, your deponent respectfully requests an arrest warrant for the defendant RAZA SIKANDAR so that he may be dealt with according to law.

  
\_\_\_\_\_  
LEAH NEWTON  
Special Agent  
United States Diplomatic Security Service

Sworn to before me by telephone this  
3rd day of December, 2020

  
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THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK